

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IRONWORKS PATENTS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendants.

Case No. 17-1399-RGA

**JOINT MOTION TO DISMISS AND [PROPOSED] ORDER**

Plaintiff Ironworks Patents, LLC and Defendant Apple Inc. have reached a settlement agreement that resolves all matters in this controversy between them and jointly move the Court to dismiss the above-captioned action as follows:

IT IS HEREBY ORDERED that all claims, counterclaims, and defenses that have been, or could have been, asserted in this lawsuit against Apple Inc. by Ironworks Patents, LLC are dismissed with prejudice.

IT IS HEREBY ORDERED that all claims, counterclaims, and defenses that have been or could have been asserted in this lawsuit against Ironworks Patents, LLC by Apple Inc. are dismissed without prejudice.

IT IS HEREBY ORDERED that all attorneys' fees, costs of court, and expenses shall be borne by each party incurring the same.

IT IS HEREBY ORDERED that the Court shall retain jurisdiction to enforce the settlement agreement.

Dated: November 30, 2018

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*Attorneys for Defendant, Apple Inc.*

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2018.

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United States District Judge